

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

TOUCHTUNES MUSIC CORP.,

Plaintiff,

-against-

ROWE INTERNATIONAL CORP.,
ARACHNID, INC.,
AMI ENTERTAINMENT, INC. and
MERIT INDUSTRIES, INC. d/b/a MERIT
ENTERTAINMENT,

Defendants.

Civil Action No. 07-cv-11450-RWS

AND RELATED COUNTER CLAIMS

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT OF NO INEQUITABLE CONDUCT**

PLEASE TAKE NOTICE that the undersigned attorneys for Defendant and Counterclaimant, Arachnid, Inc. (“Arachnid”) hereby move the Court, before the Honorable Robert W. Sweet, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 18C, New York, New York 10007, as soon as counsel may be heard, for entry of an Order granting Arachnid’s Motion for Summary Judgment of No Inequitable Conduct.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Arachnid shall rely upon this Notice of Motion; the accompanying Memorandum in Support of Motion for Summary Judgment of No Inequitable Conduct, dated October 16, 2012; the accompanying Declaration of James E. Hanft in Support of Motion for Summary Judgment of No Inequitable Conduct, dated October 16, 2012, and the attachments thereto; the accompanying Rule 56.1 Statement of

Undisputed Material Facts in Support of Motion for Summary Judgment of No Inequitable Conduct, dated October 16, 2012; and the and all prior filings and proceedings herein.

Dated: New York, New York
October 16, 2012

By: /s/ James E. Hanft
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